

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RICHARD GOLDEN,
an individual,

Plaintiff,

Case No.

v.

Hon.

JANG H. LIM, d/b/a
DENTAL USA, INC.,

Defendant.

Ronald W. Citkowski (P-34732)
GIFFORD, KRASS, SPRINKLE,
ANDERSON & CITKOWSKI, P.C.
2701 Troy Center Drive, Suite 330
P.O. Box 7021
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(248) 647-5210 (Facsimile)
litigation@patlaw.com
Attorney for Plaintiff

COMPLAINT AND DEMAND FOR JURY TRIAL

Parties and Jurisdiction

1. Plaintiff, Richard Golden, is resident of Michigan residing in the city of Grosse Pointe.
2. Upon information and belief, Defendant Jang H. Lim is doing business as Dental USA, Inc., having a regular and established place of business at 5005 McCollum Lake Road, McHenry, Illinois 60050.

3. This action arises under the patent laws of the United States. This Court has jurisdiction under 35 U.S.C. §281 and 28 U.S.C. §1338. Venue is proper under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c).

Count I

4. Plaintiff realleges Paragraphs 1-3 as if fully set forth therein.

5. Plaintiff is the owner of the following United States Letters Patent Nos. which are attached hereto:

- a. 6,910,890 issued June 28, 2005 (Exhibit A)
- b. D566,840 issued April 15, 2008 (Exhibit B);
- c. D567,376 issued April 22, 2008 (Exhibit C);
- d. D561,899 issued February 12, 2008 (Exhibit D); and
- e. D590,947 issued April 21, 2009 (Exhibit E)

6. On information and belief, Defendant has infringed the Letters Patent as described and set forth above and actively induces and contributes to the infringement thereof by others through the manufacture, use and sale of these dental instruments and will continue to do so in this judicial district and elsewhere throughout the United States to the irreparable damage of the Plaintiff unless enjoined by this Court; 35 U.S.C. §271(a), §271(b) and §271(c).

7. Defendant's infringement of said Letters Patent as described and set forth above. is willful.

8. The aforementioned action by Defendant has occurred with full knowledge of Plaintiff's patent rights.

9. The aforesaid actions by Defendant have damaged Plaintiff.

WHEREFORE, Plaintiff prays that:

1. The Defendant, officers, agents, employees, successors and assigns, and all persons or entities holding by, through or under them and all those acting for them or in their behalf, be preliminarily enjoined during the pendency of the action and thereafter be permanently enjoined from further infringement of Plaintiff's Letters Patent No. 6,062,518.

2. The Defendant account for and pay to Plaintiff all damages sustained by Plaintiff as determined by the jury by reasons of Defendant's infringement of said Letters Patent.

3. This Court declare this case to be exceptional pursuant to 35 USC §285 and award Plaintiff triple damages as determined by the jury together with Plaintiff's attorney fees and costs associated with this action.

4. Plaintiff be granted such other and further relief as is just.

Respectfully submitted,

/s/Ronald W. Citkowski
Ronald W. Citkowski (P-34732)
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Attorney for Plaintiff

Date: September 9, 2009

JURY DEMAND

Plaintiff hereby demands a jury trial in the foregoing matter.

Respectfully submitted,

/s/Ronald W. Citkowski
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Date: September 9, 2009